

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUÑIZ,  
MARCUS MARTIN, NATALIE ROMERO,  
CHELSEA ALVARADO, JOHN DOE, and  
THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**MOTION FOR *PRO HAC VICE* ADMISSION OF MATTEO GODI**

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding hereby move the Court for the admission of Matteo Godi, Esquire to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Godi is an associate with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, 2001 K Street, N.W., Washington, DC 20006-1047; Phone 202.223.7322; Email: mgodi@paulweiss.com

2. Mr. Godi is qualified and licensed to practice law and is a bar member in good standing in the District of Columbia (Bar ID No. 1618447 - Since 2019). He is also a member of the bar, in good standing, for the following federal courts: U.S. District Courts for the Northern District of New York and the District of Columbia and U.S. Courts of Appeals for the Second, Fourth, Fifth and D.C. Circuits.

3. Mr. Godi agrees to submit and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Matteo Godi, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: October 11, 2021

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

11951 Freedom Drive, 14th Floor

Reston, VA 20190-5656

Telephone: (703) 456-8000

Fax: (703) 456-8100

rcahill@cooley.com

### CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Elmer Woodard  
5661 US Hwy 29  
Blairs, VA 24527  
isuecrooks@comcast.net

James E. Kolenich  
Kolenich Law Office  
9435 Waterstone Blvd. #140  
Cincinnati, OH 45249  
jek318@gmail.com

*Counsel for Defendants Jason Kessler, Nathan Damigo,  
Identity Europa, Inc. (Identity Evropa)*

Justin Saunders Gravatt  
David L. Hauck  
David L. Campbell  
Duane, Hauck, Davis & Gravatt, P.C.  
100 West Franklin Street, Suite 100  
Richmond, VA 23220  
jgravatt@dhdglaw.com  
dhauck@dhdglaw.com  
dcampbell@dhdglaw.com

*Counsel for Defendant James A. Fields, Jr.*

Bryan Jones  
106 W. South St., Suite 211  
Charlottesville, VA 22902  
bryan@bjoneslegal.com

*Counsel for Defendants Michael Hill, Michael Tubbs,  
and League of the South*

Joshua Smith Esq.  
Smith LLC  
807 Crane Ave.  
Pittsburgh, PA 15216  
joshsmith2020@gmail.com

*Counsel for Matthew Heimbach, Matthew Parrott and  
Traditionalist Worker Party*

William Edward ReBrook, IV  
The ReBrook Law Office  
6013 Clerkenwell Court  
Burke, VA 22015  
edward@rebrooklaw.com  
rebrooklaw@gmail.com

*Counsel for Defendants Jeff Schoep, National Socialist  
Movement, Nationalist Front, Matthew Heimbach,  
Matthew Parrott and Traditionalist Worker Party*

I further hereby certify that on October 11, 2021, I also served the following non-ECF Defendants/participants, via electronic mail or First Class U.S. mail, as follows:

Robert Ray  
azzmador@gmail.com

Vanguard America  
c/o Dillon Hopper  
dillon\_hopper@protonmail.com

**VIA U.S. Mail**

Christopher Cantwell  
Christopher Cantwell - Inmate: 00991-509  
Grady County Law Enforcement Center (Oklahoma)  
215 N. 3rd Street  
Chickasha, OK 73018

Richard Spencer  
richardbspencer@gmail.com  
richardbspencer@icloud.com

Elliott Kline  
eli.f.mosley@gmail.com  
deplorabletruth@gmail.com  
eli.r.kline@gmail.com

/s/ David E. Mills  
David E. Mills  
*Counsel for Plaintiffs*